

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

L. LIN WOOD, JR.,

Plaintiff,

v.

PAULA J. FREDERICK, et al.,

Defendants.

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)
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Case No. 1-21-cv-01169-TCB

AFFIDAVIT OF L. LIN WOOD, JR.

I, L. Lin Wood, Jr., being duly sworn, depose and state as follows:

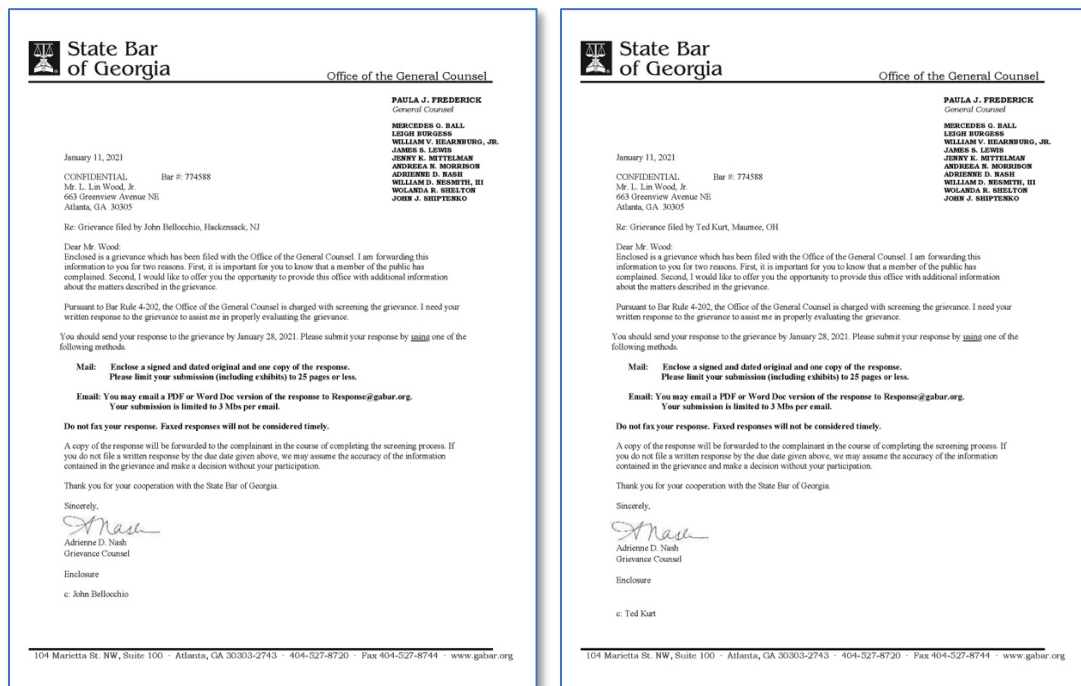
1. My name is L. Lin Wood. I am over 18 years of age and of sound mind, and I am capable of making this affidavit. I submit this affidavit in support of the Plaintiff's Motion for Preliminary Injunction. I have personal knowledge of the facts set forth herein, and, if called to testify about those facts, I could and would do so competently and under oath.

2. I am a licensed attorney in the State of Georgia and have been practicing law in the state for 43 years. In 1997, I formed L. Lin Wood, P.C. ("LLW PC"), a professional corporation registered to transact business in Georgia, in September of

1997 for the purpose of conducting my law practice. I am and always have been the President and sole owner and partner of LLW PC.

3. I am currently a resident of South Carolina. I changed my residency from Georgia to South Carolina on February 1, 2021.

4. I received two letters dated January 11, 2021, from Adrienne D. Nash, acting in her capacity as the State Bar of Georgia Grievance Counsel.



5. The letters contained two (2) grievances which had been filed by Mr. John Bellocchio, Hackensack, NJ, and Mr. Ted Kurt, Maumee, OH.

6. The first grievance was dated January 1, 2021 and signed by John BeBellocchio.

STATE BAR OF GEORGIA
GRIEVANCE
CONFIDENTIAL

PLEASE TYPE OR PRINT LEGIBLY IN BLACK INK ONLY
DO NOT ALTER THIS FORM

YOUR NAME: JOHN V. BELLOCCHIO

MAILING ADDRESS: 179 Holt St. HARTWELL GA 07601
Street or P.O. Box City State Zip

YOUR EMAIL ADDRESS: bellocchioj@outlook.com

YOUR PHONE NUMBERS: (HCELL) 2019492265 (W) None

NAME OF THE ATTORNEY: L. LIN WOOD
Fill out a separate form for each attorney. Do not list law firms.

ADDRESS OF THE ATTORNEY: PO Box 52584, Atlanta, GA 30355-0584

DATE OF FIRST CONTACT WITH ATTORNEY: 12/3/20 DATE OF LAST CONTACT WITH ATTORNEY: 1/1/21

DOES THIS ATTORNEY CURRENTLY REPRESENT YOU? YES ☐ NO ☒ WAS THIS YOUR ATTORNEY? YES ☐ NO ☒

IS YOUR CASE: CRIMINAL ☐ CIVIL ☐ CASE # _____

COUNTY: _____ OR FEDERAL DISTRICT: NORTHERN ☐ MIDDLE ☐ SOUTHERN ☐

CLEARLY DESCRIBE YOUR COMPLAINT AND ATTACH SUPPORTING DOCUMENTS:

See attached explanation.

If more space is needed, please attach other pages. Please do not write on the back.

Return to: **State Bar of Georgia**
Office of the General Counsel
104 Marietta St. NW, Suite 100
Atlanta, GA 30303

"I affirm that I have read and understand the information and instructions.
The information provided here is true to the best of my knowledge."
SIGNATURE: J. Bellocchio
DATE: 1/1/21

OPTIONAL: PLEASE PROVIDE THE NAME AND PHONE NUMBER OF SOMEONE WE CAN CONTACT IF WE HAVE DIFFICULTY CONTACTING YOU.

NAME OF CONTACT PERSON: _____

PHONE NUMBERS OF CONTACT PERSON: (H) _____ (CELL) _____

Revised 07/02/2020

Attorney L. Lin Wood, licensed and practicing law in the State of Georgia, is guilty of violating Georgia § 16-11-1 – TREASON, which states, in part, "...commits the offense of treason when he knowingly levies war against the state, adheres to her enemies, or gives them aid and comfort."

As per the attached, released to the public via Twitter, where Attorney Wood calls for the death of the Vice President of the United States via firing squad, I am alleging Attorney Wood has committed an act of treason.

Accordingly, I am asking the Office of the General Counsel of the State Bar of Georgia to seek Mr. Wood's permanent disbarment effective at the earliest juncture.

Very truly yours,

J. Bellocchio
John Bellocchio
1/1/21

1/1/2021 § 16-11-1 - Treason :: 2015 Georgia Code :: US Codes and Statutes :: US Law :: Justia

Laws & Legal Resources.

[View the 2019 Georgia Code](#) | [View Previous Versions of the Georgia Code](#)

2015 Georgia Code
Title 16 - CRIMES AND OFFENSES
Chapter 11 - OFFENSES AGAINST
PUBLIC ORDER AND SAFETY
Article 1 - TREASON AND OTHER
SUBVERSIVE ACTIVITIES
Part 1 - GENERAL PROVISIONS
§ 16-11-1 - Treason

Universal Citation: GA Code § 16-11-1 (2015)

(a) A person owing allegiance to the state commits the offense of treason when he knowingly levies war against the state, adheres to her enemies, or gives them aid and comfort. No person shall be convicted of the offense of treason except on the testimony of two witnesses to the same overt act or on confession in open court. When the overt act of treason is committed outside this state, the person charged therewith may be tried in any county in this state.

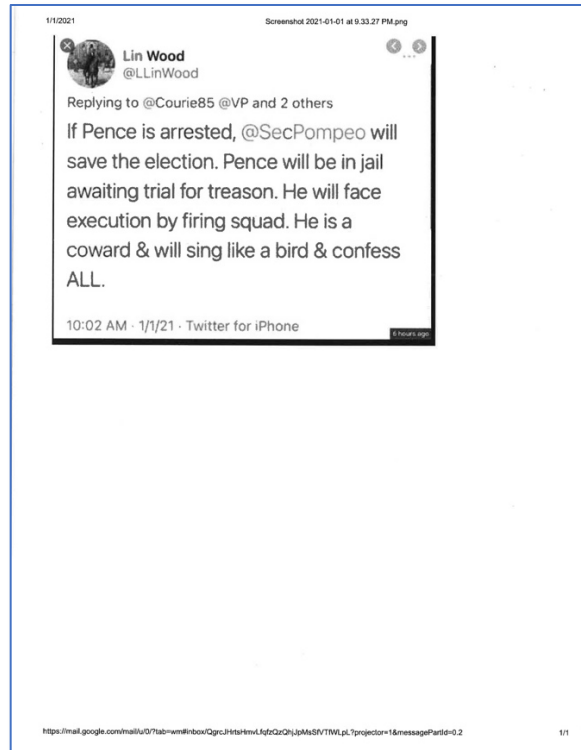
(b) A person convicted of the offense of treason shall be punished by death or by imprisonment for life or for not less than 15 years.

[https://law.justia.com/codes/georgia/2015/title-16/chapter-11/article-1/part-1/section-16-11-18--text-\(a\) A person owing allegiance gives them aid and ...](https://law.justia.com/codes/georgia/2015/title-16/chapter-11/article-1/part-1/section-16-11-18--text-(a) A person owing allegiance gives them aid and ...) 1/2

1/1/2021 § 16-11-1 - Treason :: 2015 Georgia Code :: US Codes and Statutes :: US Law :: Justia

Disclaimer: These codes may not be the most recent version. Georgia may have more current or accurate information. We make no warranties or guarantees about the accuracy, completeness, or adequacy of the information contained on this site or the information linked to on the state site. Please check official sources.

[https://law.justia.com/codes/georgia/2015/title-16/chapter-11/article-1/part-1/section-16-11-18--text-\(a\) A person owing allegiance gives them aid and ...](https://law.justia.com/codes/georgia/2015/title-16/chapter-11/article-1/part-1/section-16-11-18--text-(a) A person owing allegiance gives them aid and ...) 2/2

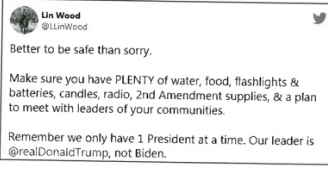


7. The grievance stated that I was “guilty of violating Georgia Section 16-11-1 –TREASON, which states, in part, “...commits the offense of treason when he knowingly levies war against the state, adheres to her enemies, or give them aid and comfort.”

8. John Bellocchio, who resides in Hackensack, New Jersey, has never met or spoken with the me. He has never been in an attorney-client relationship with me. Yet, in his bar grievance filed on January 4, 2021, he accuses the me of treason by knowingly levying war against the State of Georgia, adhering to her enemies and giving them aid or comfort”. This false and defamatory allegation by Mr. Bellocchio is based entirely on a single comment on my personal Twitter account which was

critical of former Vice-President Mike Pence. It was a comment which was purely political and rhetorical hyperbole and is thus protected under the First Amendment.

9. Ted Kurt, is a retired attorney in Maumee, Ohio. He admits in his bar grievance that he has never had any direct contact with the myself, and that he has never been in an attorney-client relationship with the me.

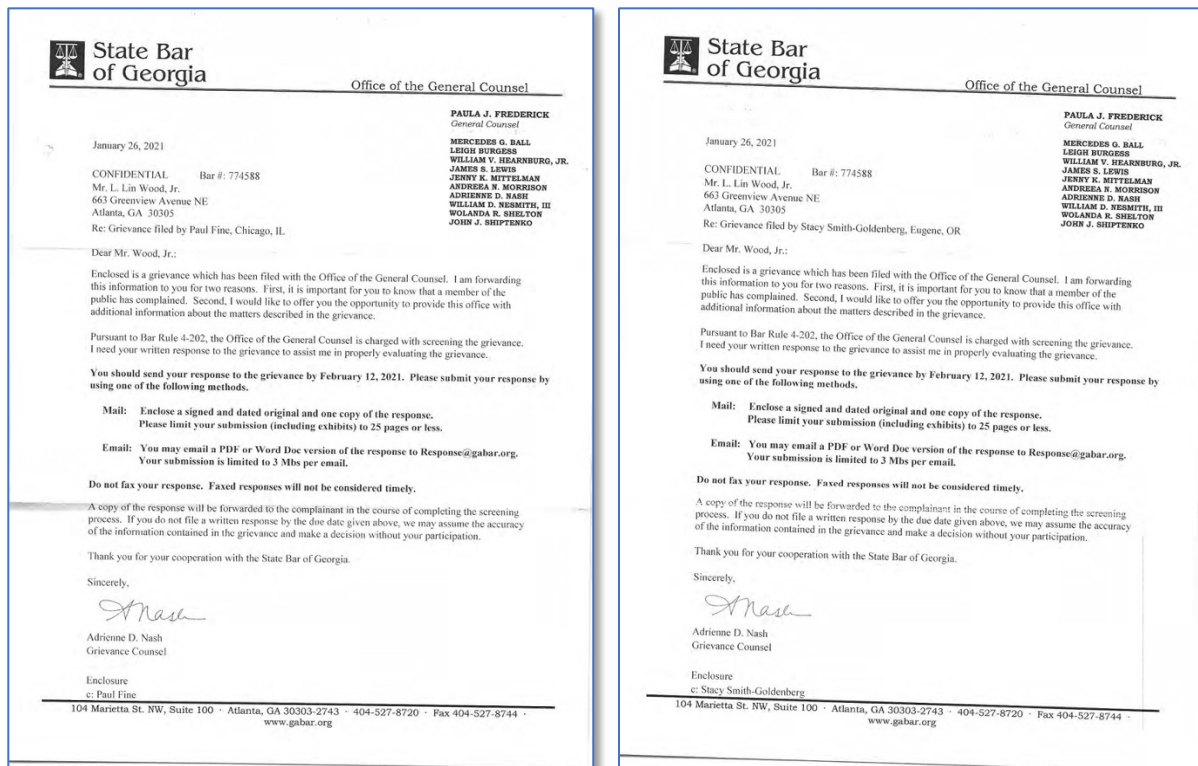
STATE BAR OF GEORGIA GRIEVANCE CONFIDENTIAL		RECEIVED DEC 28 2020 STATE BAR OF GEORGIA
PLEASE TYPE OR PRINT LEGIBLY IN BLACK INK ONLY DO NOT ALTER THIS FORM		
YOUR NAME: Ted Kurt		
MAILING ADDRESS: 418 W. Dudley Street Maumee Ohio 43537		
YOUR EMAIL ADDRESS: tedkurt@tedkurt.com		
YOUR PHONE NUMBERS: (H/CELL) 419-480-7956 (W) 419-480-7956		
NAME OF THE ATTORNEY: Lin Wood		
ADDRESS OF THE ATTORNEY: P.O. Box 52584 Atlanta, GA 30355-0584		
DATE OF FIRST CONTACT WITH ATTORNEY: no direct contact DATE OF LAST CONTACT WITH ATTORNEY:		
DOES THIS ATTORNEY CURRENTLY REPRESENT YOU? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> WAS THIS YOUR ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>		
YOUR CASE: CRIMINAL <input type="checkbox"/> CIVIL <input checked="" type="checkbox"/> CASE #		
COUNTY: OR FEDERAL DISTRICT: NORTHERN <input type="checkbox"/> MIDDLE <input type="checkbox"/> SOUTHERN <input type="checkbox"/>		
CLEARLY DESCRIBE YOUR COMPLAINT AND ATTACH SUPPORTING DOCUMENTS:		
Insufficient space provided. Please see attached single page		
Return to:	State Bar of Georgia Office of the General Counsel 184 Marietta St. NW, Suite 100 Atlanta, GA 30303	"I affirm that I have read and understand the information and instructions. The information I have provided here is true to the best of my knowledge." SIGNATURE: <i>[Signature]</i> DATE: 12-17-20
OPTIONAL: PLEASE PROVIDE THE NAME AND PHONE NUMBER OF SOMEONE WE CAN CONTACT IF WE HAVE DIFFICULTY CONTACTING YOU.		
NAME OF CONTACT PERSON:		
PHONE NUMBERS OF CONTACT PERSON: (H) (CELL)		
Continuation page: Ted Kurt, Grievant; Lin Wood, Respondent December 17, 2020 p. 1 of 1		
My purpose in filing this grievance is to bring to the attention of the Georgia State Bar the unprofessional conduct of a certain member of the Georgia Bar, Mr. Lin Wood. Mr. Wood represented the non-prevailing party, Donald Trump, in multiple court challenges to overturn Mr. Trump's 2020 election loss. In the wake of several Courts' orders denying and/or dismissing his claims, Mr. Wood, understandably disappointed, on December 14, 2020 published a message on his Twitter account (which account has 802,000 followers, or persons who receive his tweets) that read in part (copy of Tweet embedded below),		
Better to be safe than sorry. Make sure you have PLENTY of water, food, flashlights & batteries, candles, radio, 2nd Amendment supplies, & a plan to meet with leaders of your communities.		
Mr. Wood's reference to second amendment supplies is an unmistakable reference to ammunition and firearms – a call to arms.		
In addition, Mr. Wood has suggested to his second amendment-supplied followers that they ought to meet with community leaders. This suggestion appears to target public officials in his call to arms. This is not an idle threat and it should not be expected to fall on deaf ears. Since the election, Gabriel Sterling, Georgia's voting system implementation manager, and Georgia Secretary of State Brad Raffensperger – and their families – have received numerous death threats.		
In advocating firearm violence, and particularly in implying such violent acts be carried out against particular persons such as election officials, Mr. Wood has engaged in conduct that constitutes moral turpitude. He has done so in direct contravention of his sworn obligation to uphold the law.		
Although I am not a resident of the State of Georgia, I am of the belief Mr. Wood's call to arms has the likelihood of adversely affecting me, as well as others who live outside Georgia. As I noted, nearly one million persons follow Mr. Wood on Twitter. His seditious speech is therefore not limited to his followers in Georgia.		
I am a retired attorney, admitted to the Ohio Bar in 1979. I am therefore not unfamiliar with the rules of professional conduct to which lawyers are subject, and the ethical responsibilities to which lawyers should strive to aspire. I am also aware that we are required to represent our clients with zeal, however the requirement of zealous advocacy is not absolute; there are limitations. Mr. Wood's comments exceeded any such limitations, and he should be called to account for having publicly expressed his disappointment in a manner that violates the provisions of the Georgia Rules of Professional Conduct in particular, and further in such a manner that is inconsistent with the ethical responsibilities of attorneys in general.		
		

10. In his grievance, which was received by the State Bar of Georgia on December 28, 2020, Mr. Kurt's sole criticism of the me, involves what he characterizes as "seditious speech" by myself on my personal Twitter account on December 14, 2020.


11. The comment published by me, which forms the basis of Mr. Kurt's bar grievance, reads as follows: "Better be safe than sorry. Make sure you have plenty

of water, food, flashlights and batteries, candles, radio, 2nd Amendment supplies, and a plan to meet with leaders in your communities.” After the recent record snowfall in Texas, I received several thank you emails from Texas residents who credited me with saving them since they heeded my comments of which Mr. Kurt complains.

12. I received two additional letters dated January 26, 2021, from Ms. Adrienne D. Nash, acting in her capacity as the State Bar of Georgia Grievance Counsel.




13. This letter contained two (2) more grievances filed by Mr. Paul Fine, an attorney from Chicago, IL, and Ms. Stacy Smith Goldenberg, an attorney from Eugene, Oregon.

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The suit named Pence, who has a largely ceremonial role in next week's proceedings, as the defendant and asked the court to throw out the 1887 law that spells out how Congress handles the vote counting. It asserted that the vice president 'may exercise the exclusive authority and sole discretion in determining which electoral votes to count for a given State.'



© Michael Elins/PhotoDisc/Getty Images

Provided by Daily Mail Rep. Louie Gohmert and Arizona's slate of Republican electors have used Vice President Mike Pence in an effort to get a Texas-based federal judge to give Pence the right to choose which electoral votes courts. The suit has since been denied.




© AP

Provided by Daily Mail Vice President Mike Pence refused to sign on to a plan that would have him choose to read the votes cast by President Donald Trump's electors in states that President-elect Joe Biden won when he presides over a Congressional session to finalize the election on January 6


In dismissing the lawsuit filed by Rep. Louie Gohmert, R-Texas, and a group of Republican electors from Arizona, Texas U.S. District Judge Jerrold Kennedy, a Trump appointee, wrote that the plaintiffs 'allege an

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© Provided by Daily Mail Wood has also suggested that Georgia Gov. Brian Kemp, pictured, should be arrested

He recently called on Georgians to boycott the upcoming runoff elections - which will determine which party controls the Senate and alleged the state's Republican Governor Brian Kemp is a 'Republican in name only' and complicit in the massive voter fraud alleged by Mr Trump.

Trump, the first president to lose a reelection bid in almost 30 years, has attributed his defeat to widespread voter fraud. But a range of nonpartisan election officials and Republicans has confirmed there was no fraud in the November contest that would change the results of the election. That includes former Attorney General William Barr, who said he saw no reason to appoint a special counsel to look into the president's claims about the 2020 election. He resigned from his post last week.

Trump and his allies have filed roughly 50 lawsuits challenging election results, and nearly all have been dismissed or dropped. He's also lost twice at the Supreme Court.

Democratic President-elect Joe Biden won the presidential election by more than 7 million votes and earned 306 Electoral College votes, compared to Trump's 232.

The December 14 meeting of the Electoral College cemented that count.

Then, on January 6, Pence will preside over what's usually a ceremonial meeting of Congress to count the votes.

House members and senators are allowed to object to states' counts - and Gohmert said he still plans to engage in that effort.

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15. Mr. Fine admits that I have never been in an attorney-client relationship with him.

16. Mr. Fine based his bar grievance entirely on a comment published by me on my personal Twitter account that was critical of former Vice-President Mike Pence on certain comments allegedly published by me on January 1, 2021.

17. Mr. Fine makes the defamatory and unsupported allegation that because of my Twitter comment, I must be “either mentally unbalanced, or willing to misuse the legal process for improper ends.”

18. My personal Twitter account comments constitute political, rhetorical hyperbole and are thus protected speech under the First Amendment and cannot constitutionally serve as a basis for requiring me to undergo a mental evaluation.

19. Ms. Stacey Smith-Goldenberg is an attorney who resides in Eugene, Oregon.

 **STATE BAR OF GEORGIA**
GRIEVANCE
CONFIDENTIAL

RECEIVED
JAN 14 2021
STATE BAR OF GEORGIA

PLEASE TYPE OR PRINT LEGIBLY IN BLACK INK ONLY
DO NOT ALTER THIS FORM

YOUR NAME: Stacey D. Smith Goldenberg

MAILING ADDRESS: PO BOX 50244 Eugene OR 97405
Street or P.O. Box City State Zip

YOUR EMAIL ADDRESS: stacey@staceysmithlaw.com

YOUR PHONE NUMBERS: (H/CELL) _____ (W) 541 504 6985

NAME OF THE ATTORNEY: L Lin Wood
Fill out a separate form for each attorney. Do not list law firms.

ADDRESS OF THE ATTORNEY: 663 Greenview Ave. NE, Atlanta, GA 30305

DATE OF FIRST CONTACT WITH ATTORNEY: N/A DATE OF LAST CONTACT WITH ATTORNEY: N/A

DOES THIS ATTORNEY CURRENTLY REPRESENT YOU? YES ☐ NO ☒ WAS THIS YOUR ATTORNEY? YES ☐ NO ☒

IS YOUR CASE: CRIMINAL ☐ CIVIL ☐ CASE # N/A

COUNTY: _____ OR FEDERAL DISTRICT: NORTHERN ☐ MIDDLE ☐ SOUTHERN ☐

CLEARLY DESCRIBE YOUR COMPLAINT AND ATTACH SUPPORTING DOCUMENTS:
Mr Wood was banned/suspended from Twitter on 6 Jan 2021 for unapologetically inciting violence and calling for the execution of Vice President Michael Pence, in the lead up to the riot and insurrection at the US Capitol on 1/06. Following Mr. Wood's incitements, rioters/insurrectionists showed up at the 'event' at the Capitol building with the tools, the means, the will and the apparent plan to carry out the execution of VP (including a makeshift gallows and noose, firearms, etc). Upon entering the Capitol, audio tape reveals that they were demanding to know where the VP was; numerous rioters were chanting "hang Mike Pence." This is widely reported and audio and video are available (https://www.youtube.com/watch?v=Fag0aL_M0_U; @S9Dallas on twitter). Another social media forum, called Parler has removed several of Mr Wood's incendiary posts, for reasons that underly this bar complaint. Mr Wood has made the following statements on Twitter & Parler since December 2020, which vary from unethical, inciting violence and insurrection, to unbinged from reality/mentally unstable: (1) 1/06/2021 on Parler: "Get the firing squads ready. Pence goes FIRST." (2) I might actually be Christ coming back for a second time in the form of an imperfect man, elevating Christ consciousness; if Pence is arrested, Sec. of State Mike Pompeo "will save the election" and "Pence will be in jail awaiting trial for treason; he will face execution by firing squad and will sing like a bird." The time has come for the Georgia State Bar to revoke Mr Wood's license to practice law.

If more space is needed, please attach other pages. Please do not write on the back.

Return to: **State Bar of Georgia**
Office of the General Counsel
104 Marietta St. NW, Suite 100
Atlanta, GA 30303

"I affirm that I have read and understand the information and instructions.
The information I have provided is true to the best of my knowledge."
SIGNATURE: [Signature]
DATE: 10 January 2021

OPTIONAL: PLEASE PROVIDE THE NAME AND PHONE NUMBER OF SOMEONE WE CAN CONTACT IF WE HAVE DIFFICULTY CONTACTING YOU.

NAME OF CONTACT PERSON: _____

PHONE NUMBERS OF CONTACT PERSON: (H) _____ (CELL) _____

Revised 07.02.2020

20. Ms. Smith-Goldenberg admitted in her bar grievance filed against me that she has never met or spoken with the myself. I agree.

21. She admitted that I have never been in an attorney-client relationship with her. I agree.

22. Ms. Smith-Goldenberg accused that the comments on my personal Twitter account were inciting the “riot and insurrection at the U.S. Capitol on January 6, 2021.”

23. These comments, which at most constitute rhetorical hyperbole, Ms. Smith-Goldenberg called on the State Bar of Georgia to “revoke my license to practice law.” I would again reiterate that my comments were of a political nature and rest on the highest rung of protection under the First Amendment.

24. On January 29, 2021, I provided via email to Ms. Paula Frederick an online interview link with Monica Matthews.

From: **Lin Wood**
Sent: Friday, January 29, 2021 10:21 PM
To: **Paula Frederick** <paulaf@gabar.org>
Subject: **My Bar License**

Paula,

Please share the message in the link below with the members of the Executive Committee.

I hope they make a wise decision and avoid the battle over an medical exam that is unjustified.
The Bar does not regulate my personal right of free speech.

<https://t.co/lgrko1dcHx>

Thank you.

Lin

L. Lin Wood
L. Lin Wood, P.C.
P.O. Box 52584
Atlanta, GA 30355-0584
Telephone: (404) 891-1402
Direct Dial: (404) 891-1406
E-Mail: lwood@linwoodlaw.com

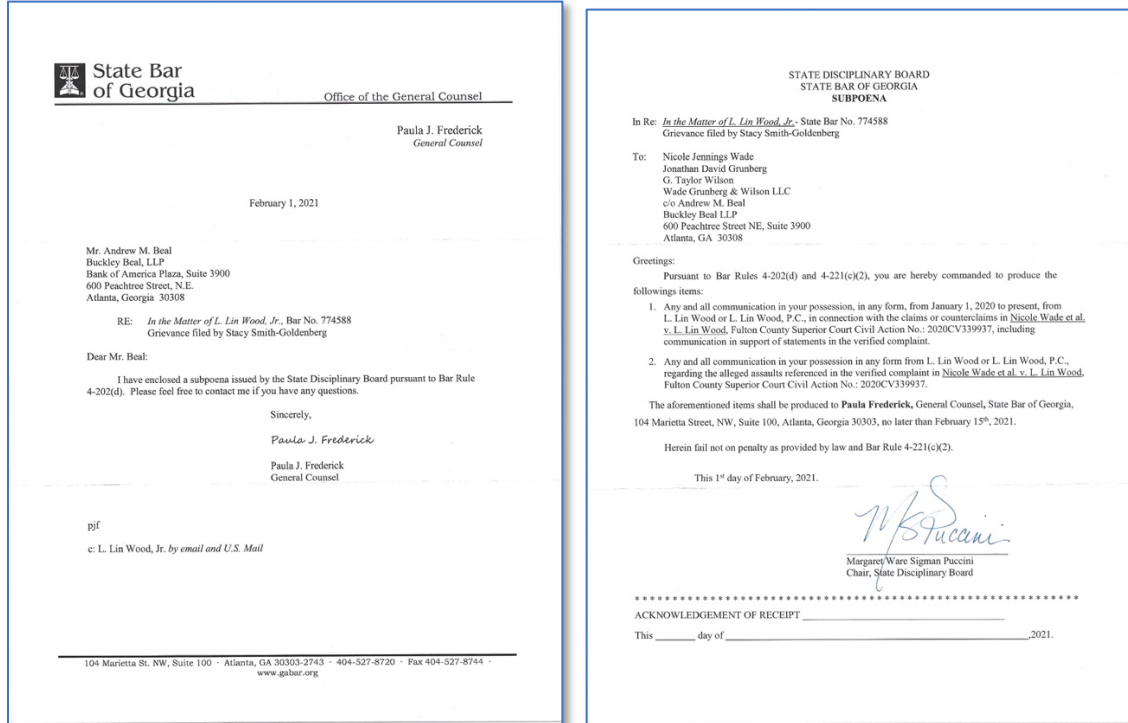
25. The email stated:

“Paula, “Please share the message in the link below with the members of the Executive Committee. I hope they make a wise decision and

avoid the battle over a medical exam that is unjustified. The bar does not regulate my personal right of free speech.”

<https://t.co/lgrko1dcHx> Thank you, Lin.”

26. On February 1, 2021, I was copied on a letter from Margaret Ware Sigman Puccini, in her capacity as Chair, State Disciplinary Board of State Bar of Georgia to Ms. Nicole Jennings Wade, Mr. Jonathan David Grunberg, G. Taylor Wilson; Wade, Grunberg, & Wilson, LLC., c/o Mr. Andres M. Beal; Buckley Beal LLP, a subpoena issued by the State Disciplinary Bar pursuant to Bar Rule 4-202(d) and 4-221(c)(2) based on the grievance filed by Stacy Smith-Goldenberg.



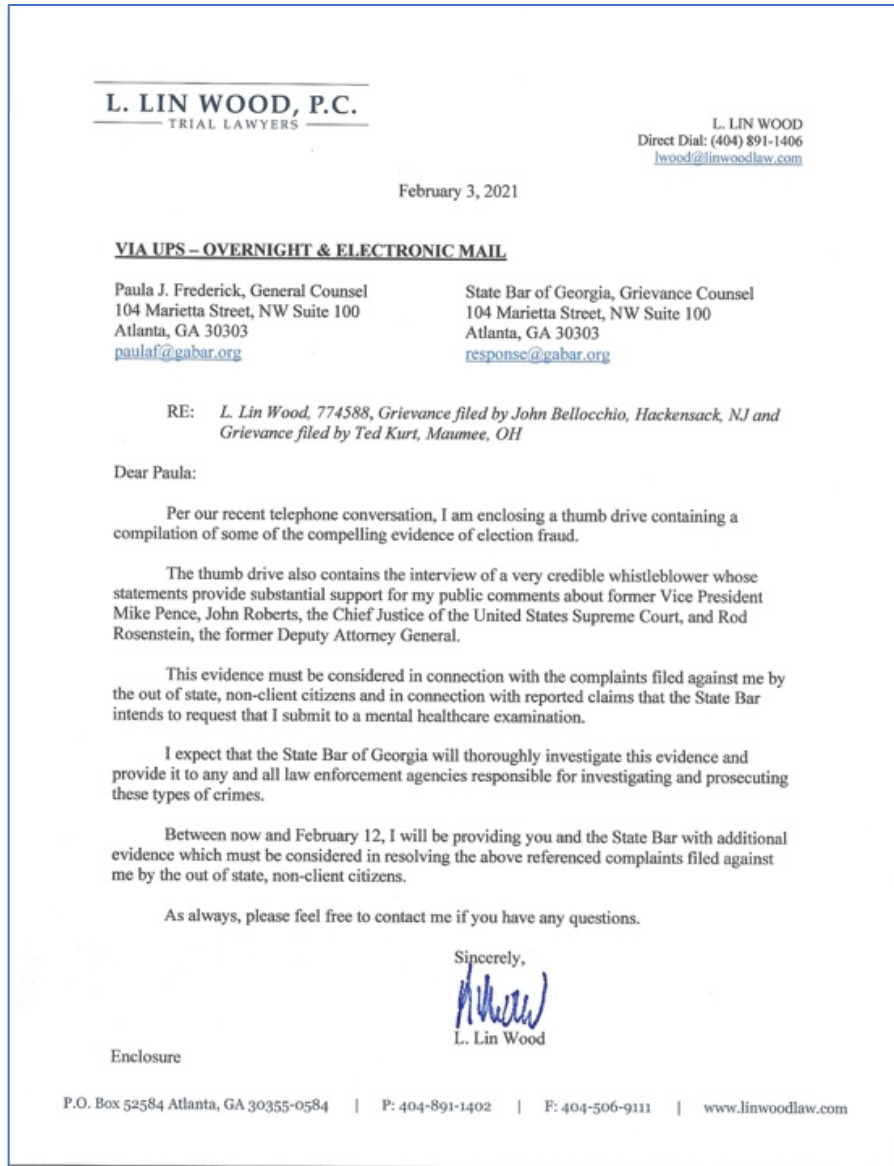
27. This letter was styled: In the matter of L.Lin Wood, Jr. – State Bar No. 774588.

28. The letter/subpoena stated the following:

Pursuant to Bar Rules 4-202(d) and 4-221(c)(2) you are hereby commanded to produce the following items:

1. Any and all communication in your possession, in any form from January 1, 2020 to present, February 1, 2021, from L. Lin Wood, or L. Lin Wood, P.C., in connection with the claims or counterclaims in Nicole Wade et al. v. L. Lin Wood, Fulton County Superior Court Civil Action No.: 2020CV339937, including communication in support of statements in the verified complaint.
2. Any and all communication in your possession in any form from L. Lin Wood or L. Lin Wood, P.C., regarding the alleged assaults referenced in the verified complaint in Nicole Wade et al. v. L. Lin Wood, Fulton County Superior Court Civil Action No.: 2020CV339937.

29. A letter was sent by me via UPS – Overnight & Electronic email on February 3, 2021, to Ms. Paula J. Frederick, General Counsel and to the State Bar of Georgia,
Grievance Counsel.



30. This letter was in reference to the Grievance filed by John Bellocchio, Hackensack NJ and Grievance filed by Ted Kurt, Maumee, OH.

31. In this letter, I enclosed a thumb drive containing a compilation of some of the compelling evidence of election fraud.

32. The thumb drive also contains the interview of a very credible whistleblower whose statements provide substantial support for my public comments about former Vice President Mike Pence, John Roberts, the Chief Justice of the United States Supreme Court, and Rod Rosenstein, the former Deputy Attorney General.

33. I requested in this letter the evidence must be considered in connection with the complaints filed against me by the out of state, non-client citizens and in connection with reported claims that the State Bar intends to request that I submit to a mental healthcare examination.

34. On February 12, 2021, I received a State Bar of Georgia Grievance letter containing one thousand six hundred and seventy-seven (1677) pages stating:

After having considered this matter, the Board, pursuant to Rule 4-203, does hereby on its own motion initiate this Grievance as follows: The attached information indicates Mr. Wood may have engaged in conduct in violation of Georgia Rules of Professional Conduct 1.1, 1.2, 3.1, 3.3, 4.1. and 4.4, and Bar Rule 4-104.

STATE DISCIPLINARY BOARD

DISCIPLINARY PROCEEDINGS

IN THE MATTER OF:) STATE DISCIPLINARY BOARD
 Mr. L. Lin Wood, Jr.) FILE NO. 210010 (Steinmetz)
 State Bar No. 774588,)
 Respondent)

ACKNOWLEDGMENT OF SERVICE

RE: Grievance filed by State Disciplinary Board

Pursuant to the provisions of State Bar Rule 4-203.1, the undersigned Respondent hereby acknowledges service of the Notice of Investigation arising from the above-referenced grievance.

The undersigned specifically waives all other notice of said document.

This ____ day of _____, 2021.

Mr. L. Lin Wood, Jr., Respondent

CERTIFICATE OF SERVICE

I hereby certify that I have this day mailed this acknowledgement of service to Jessica Oglesby, Clerk of the State Disciplinary Board, to 104 Marietta Street, N.W., Suite 100, Atlanta, GA 30303. I will mail all future correspondence directly to the State Disciplinary Board member for the remainder of the investigation.

This ____ day of _____, 2021.

Mr. L. Lin Wood, Jr., Respondent

STATE BAR OF GEORGIA
NOTICE OF INVESTIGATIONCONFIDENTIAL

FILE NO. 210010

To: Mr. L. Lin Wood, Jr., State Bar # 774588

1.

This is a Notice of Investigation issued pursuant to Rule 4-204.1 of the Bar Rules.

2.

The grievance State Disciplinary Board filed against you is being referred to the State Disciplinary Board. A copy of the grievance is attached to this notice.

3.

The grievance alleges possible violations of Georgia Rules of Professional Conduct 1.1, 1.2, 3.1, 3.3, 4.1, 4.4.

4.

The State Disciplinary Board member investigating this matter is:

Christian Joseph Steinmetz III
 Gannam Gann & Steinmetz LLC
 PO Box 10085
 Savannah, GA 31412

5.

Please execute the enclosed Acknowledgment of Service and return it to the Clerk of the State Disciplinary Boards in the enclosed self-addressed stamped envelope within 10 days of receiving this notice. If you do not return the acknowledgement of service within 10 days, the Bar will perfect service as authorized in Bar Rule 4-203.1.

6.

Pursuant to Bar Rule 4-204.3, you must file a response to this Notice of Investigation under oath within 30 days of service. "Under oath" means that you swear or affirm that the contents of your response are truthful. You must make this affirmation in writing and sign the response in the presence of a notary. You must do so even if you previously filed a response with the Office of the General Counsel.

7.

A list of the members of this Board is enclosed with this notice. You have the right to challenge the competency, qualifications or objectivity of any member of the State Disciplinary Board within 10 days of your receipt of this notice through the procedure outlined in Rule 11 of the Rules of Conduct and Procedure of the State Disciplinary Board ("Internal Rules").

8.

Your response and all future correspondence should be mailed directly to the Board member listed in paragraph 4 above. Please send an original and one copy of your sworn response.

CERTIFICATE OF SERVICE

This is to certify that I have this day served this Notice of Investigation and attachments upon L. Lin Wood, by depositing same in the U. S. Mail, with adequate postage thereon, addressed to Respondent at the following address:

663 Greenview Avenue NE
 Atlanta, GA 30305

This 11th day of February, 2021.

Paula J. Frederick

Paula J. Frederick
 General Counsel
 State Bar of Georgia
 104 Marietta Street NW
 Suite 100
 Atlanta, Georgia 30303

Copy to: State Disciplinary Board member Steinmetz

PLEASE COMPLETE AND ATTACH THE OATH TO YOUR RESPONSE TO THE BOARD.

STATE DISCIPLINARY BOARD

DISCIPLINARY PROCEEDINGS

IN THE MATTER OF:) STATE DISCIPLINARY BOARD
 Mr. L. Lin Wood, Jr.) FILE NO. 210010 (Steinmetz)
 State Bar No. 774588,)
 Respondent)

OATH TO RESPONSE

PERSONALLY APPEARED before the undersigned attesting officer authorized by law to administer oaths, _____, who, after first being sworn, on oath deposes and says that the facts stated in the _____ are true and correct.

Signature _____

Printed Name _____

Address _____

Telephone Number _____

Sworn to and Subscribed before me, this

____ day of _____, 20__.

Notary Public

My Commission Expires:
 (Notary Seal)

Rule 11. Challenges to the Competency, Qualifications or Objectivity of State Disciplinary Board Members.

(a) A respondent lawyer shall have the right to challenge the competency, qualifications or objectivity of any member of the State Disciplinary Board. Within 10 days after service of the Notice of Investigation pursuant to Rule 4-204.1, the respondent lawyer shall deliver to the Clerk of the State Disciplinary Boards written objection to the competency, qualifications or objectivity of any member of the State Disciplinary Board. The objection shall set forth the factual basis for the challenge. The challenged member may answer the respondent lawyer's objection in writing and shall mail the answer to the respondent lawyer and the Clerk of the State Disciplinary Boards. At a regularly scheduled meeting prior to consideration of the case the Board shall excuse the challenged member from the meeting room and consider the objection. The affirmative vote of three members shall be sufficient to sustain the objection.

(b) Any member of the Board may decline to participate when the Board considers a grievance.

Dr. Connie Cooper
105 Nature's Court
Pooler, GA 31322

Mr. Christopher Sutton Connelly
P.O. Box 370
Summerville, GA 30747

Ms. Jennifer E. Dunlap
1332 Weynton Road
Columbus, GA 31906

Mr. Jeffrey R. Harris
410 E. Broughton Street
Savannah, GA 31401

Mr. Brandon Peak
P.O. Box 2766
Columbus, GA 31902

Ms. Casey Carter Santos
P.O. Box 1591
Duluth, GA 30096

Ms. Patricia F. Ammiri
3535 Roswell Road
Suite 23
Marietta, GA 30062

Ms. Kayla E. Cooper
Building 3000
535 Tellair Street
Augusta, GA 30901

Ms. Elizabeth L. Fite
4355 Cobb Parkway
Suite J564
Atlanta, GA 30339

Ms. Elissa B. Haynes
303 Peachtree Street NE
Suite 3500
Atlanta, GA 30308

Ms. Margaret W. Sigman Puccini
P.O. Box 2139
Savannah, GA 31402

Mr. Christian J. Steinmetz III
P.O. Box 10085
Savannah, GA 31412

Ms. Sherry Boston
DeKalb County District Attorney
555 N. McDonough St., Suite 700
Decatur, GA 30030

Ms. Tomieka R. Daniel
241 Third Street
Macon, GA 31201

Mr. Michael Fuller
1266 S. Jackson Springs Rd.
Macon, GA 31211

Ms. Elizabeth Pool O'Neal
P.O. Box 767
Griffin, GA 30224

Rev. David Richards
772 Masters Drive
Stone Mountain, GA 30087

Ms. Jennifer D. Ward
P.O. Box 191074
Atlanta, GA 31119

35. The grievance filed against me references two (2) complaints I filed in Georgia.

36. In the first case, I was the plaintiff and Georgia Attorney Ray S. Smith, III of the firm of Smith & Liss, LLC, represented me and prepared the pleadings. As of this date, it is unknown as to whether the Board is pursuing a disciplinary action against Mr. Smith.

37. Based on a simple and comparative review of my Georgia complaints and the Dissenting Opinion of Justice Clarence Thomas in Republican Party of Pennsylvania v. Degraffenreid, (592 U.S. ____ (2021) Docket Nos. 20-542 and 20-

574), his opinion undisputedly establishes that the claims I filed had a valid basis in law.

38. The Complaint does not specify which of the Rules have been violated in a professional setting.

39. Further, each of the non-Georgia cases filed by other attorneys as counsel of record. While I had reviewed the substantial, credible, and compelling evidence of election fraud and wrongdoing compiled by Attorney Sidney Powell, a highly-respected Texas lawyer. I did not draft the complaints in those actions and was only “of counsel” in each of those cases in the event my trial experience was needed for oral argument or examination of witnesses. I was not engaged by the Plaintiff’s in those cases and had no client contact as I was merely associated by Ms. Powell in case she needed my skills and experience as a trial lawyer in the litigation.

40. I am not aware of any disciplinary complaints against any other lawyer by the State Bar of Georgia in connection with the lawsuits I filed in the State of Georgia.

41. Three of the four Powell election cases were filed in jurisdiction other than Georgia. The conduct of the lawyers in those cases are governed by the laws in those jurisdictions.

42. The second part of the Complaint cites various public statements and private statements, including tweets/social media posts.

43. I would not make a comment that I did not have a credible source or reasonable basis for believing was true, particularly if, as a defamation lawyer, I would be opening myself up to a challenge of defamation. No individual to date has filed a defamation action against me or even sent a retraction demand to me in connection with my published statements on social media. Based on my 26 years experience in handling defamation and First Amendment litigation, I am always careful to never false accuse a third person or entity unless a reasonable factual basis exists for an accusation and I am fully aware of the distinction between political and rhetorical hyperbole and actionable threats of harm. I have never published a statement on social media without ensuring that my statement was lawful speech protected by the First Amendment.

44. I provided the Bar with the copies of the supporting documents and evidence that demonstrate the support for those statements.

45. I also provided a flash drive to the Bar with that information. In my transmittal letter, I urged the Bar to fulfill its professional duties and thoroughly investigate the evidence of election fraud and the accusations of the whistleblower.

46. I have not made any statement to “incite” violence under any applicable precedent that would violate the *Brandenburg* test as enunciated in *Brandenburg v. Ohio*, 395 U.S. 444 (1969).

47. A portion of the State Bar complaint (the WGW civil lawsuit) relies upon contested allegations in pending litigation arising out of a fee dispute with lawyers with whom I formerly shared office space and associated on certain of my cases on a case-by-case basis. I have denied those allegations and they are before a court for decision as to their credibility. A motion to dismiss that portion of the WGW civil lawsuit asserting a frivolous fraud case is pending and I am seeking attorney fees and expenses for its filing by Plaintiffs.

48. I have been informed that I must submit to a mental health or psychological examination, but there is no basis for the Bar's statement that I "appear[] to be impaired to practice law" but there is nothing in the Complaint that has dealt in any way with my conduct in the practice of law.

49. I am unaware that the Bar has identified any case in which a client or former client complained that my competency was impaired.

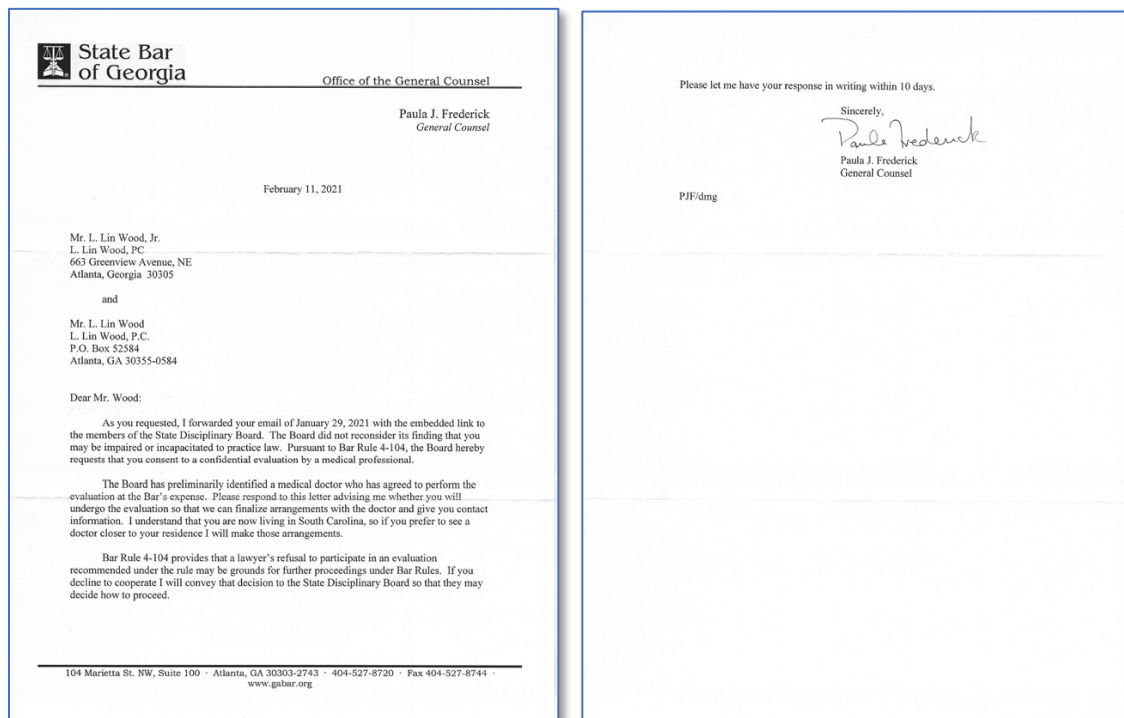
50. Pursuant to Rule 4-104, reviews are limited to specific and "appropriate" examinations that are tied to a "determination" by the "State Disciplinary Board".

51. There has been no such determination; or if there has, I was not invited to participate in any hearing prior to that determination.

52. I have not received copies of that determination, and the basis on which that determination was made. I have not been allowed to present evidence or confront witnesses against me.

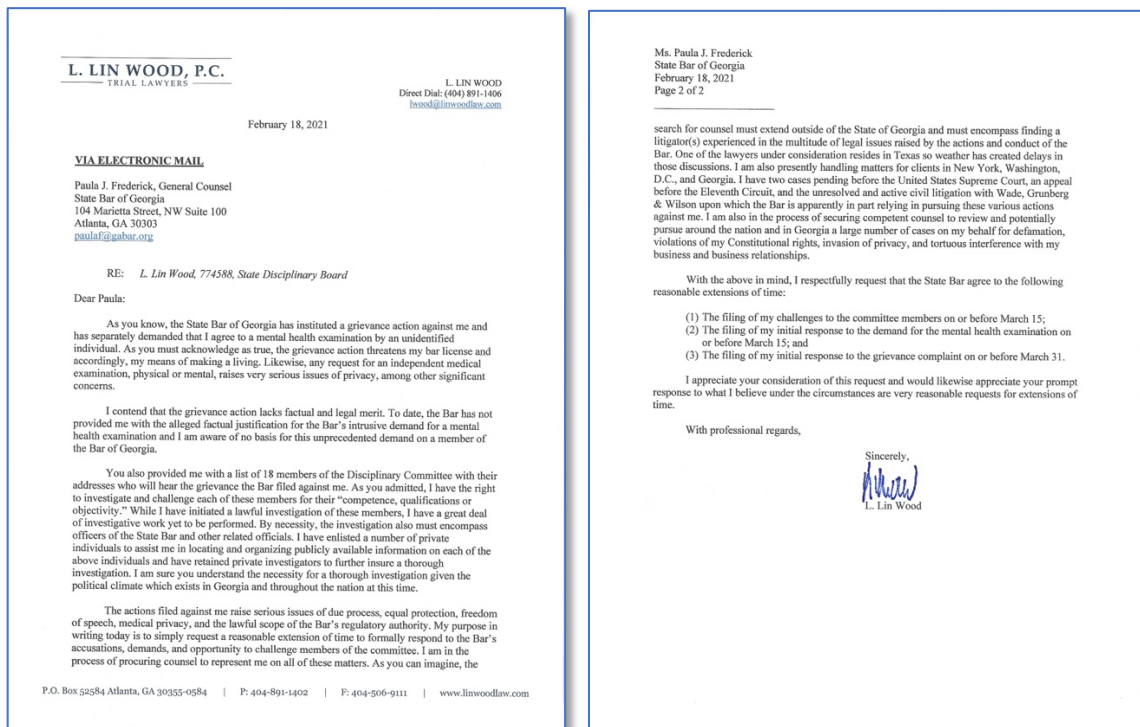
53. On February 11, 2020, I received a letter via electronic mail from Ms. Paula Frederick which stated:

“The Board did not reconsider its finding that Mr. Wood may be impaired or incapacitated to practice law. Pursuant to Bar Rule 4-104, the Board hereby requests that you consent to a confidential evaluation by a medical professional. The Board has preliminary identified a medical doctor who has agreed to perform the evaluation at the Bar’s expense.”



54. I responded by letter via electronic mail on February 18, 2021. In response to the statement that the Disciplinary Board had made A "finding," I requested "factual justification" supporting that finding. That has not been

provided. I also noted that any request for an independent medical examination, physical or mental, raises very serious issues of privacy, among other significant concerns. I have received no response to those issues.



55. This grievance action threatens my bar license and accordingly, my means of making a living.

56. I am also presently handling matters for clients in New York, Washington D.C., Missouri, and Georgia. The civil litigation with Wade, Grunberg, & Wilson upon which the Bar is in part relying in pursuing these various actions against me has been stayed (including discovery in the case) until April 12 in order

for me to make a decision on new counsel in that case. There is a possibility that I may have to represent myself in that case to reduce defense costs based on my familiarity with the facts and status of the case but no final decision on that issue has been made as of the date of this Affidavit. Also, because of the State Bar's actions against me, many lawyers in Georgia are reluctant to represent me at this time.

57. I sent a letter dated March 2, 2021 via Email and U.S. Mail – Certified to Ms. Paula Frederick informing her and the State Bar that the grievance action lacks factual and legal merit. To date, the Bar has not provided me with the alleged factual justification for the Bar's intrusive demand for a mental health examination and I am aware of no basis for this unprecedented demand on a member of the Bar of Georgia.

L. LIN WOOD, P.C.
TRIAL LAWYERSL. LIN WOOD
Direct Dial: 404-891-1406
lwood@linwoodlaw.com

March 2, 2021

VIA E-MAIL & U.S. MAIL - CERTIFIEDPaula J. Frederick, Esq.
General Counsel
State Bar of Georgia
104 Marietta Street, NW Suite 100
Atlanta, Georgia 30303
psula@gsabar.orgRe: L. Lin Wood, Proposed Grievance File No. 210010
State Disciplinary Board ("Complaint")

Dear Paula:

Thank you for your letter of February 24 granting an extension for my initial responses to the Complaint. I have spent the week discussing the Complaint with national counsel, some dealing with the rules of professional responsibility and some dealing with defamation and First Amendment law. I am meeting with various lawyers ("Proposed Counsel") and that selection should be finalized this week.

Without prejudice to the issues mentioned in my previous letter, however, Proposed Counsel are confused by the basis of the claims and have asked for clarification to the questions below.

Composition of the Disciplinary Board

1. As I noted in my letter of February 18, there are members of the Disciplinary Committee that have conflicts of interest in connection with this matter, having represented parties that have served to represent, for example, the Democrat Party in some of these or related election matters. Those conflicts taint the Complaint and any proceeding that might arise therefrom. We would ask that you clean your own house; as you might expect, we intend to challenge any actions of the Board based on input from or deliberations involving conflicted persons. Can you confirm that all members of your "Disciplinary Committee" have affirmed in writing that they have no interests that would color their judgment in these matters?

Paula J. Frederick, Esq.
March 2, 2021
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Please note that it has come to our attention that comments from third parties to members of the Bar may be the source of some of the information in the Complaint. You have provided me with only 4 formal complaints, not the other information that the Bar and the members of the Disciplinary Board have received from those third parties, including Dean Cathy Cox of the Walter F. George School of Law at Mercer University, who seems to have a financial interest in punishing me, as well as a political stake in the matter. She may also be concerned reputationally about her involvement in past decisions that I have called into question. There may be other information you have received from persons with conflicts of interest, and complete disclosure of those communications is warranted. For example, the Board received pursuant to a subpoena information from Wade, Grunberg & Wilson, LLC, (WGW) that should be promptly provided to me as WGW is undisputedly a party with adverse interests to me in pending civil litigation. I expect the Board to be impartial and I expect that I will have the rights to question or impeach any similar sources of information provided to the Board – orally or in writing. As you know, I am entitled to full due process of law.

Jurisdiction

2. Your Complaint is confusing to Proposed Counsel as the source of authority for this investigation is not clear; that is making it difficult for my Proposed Counsel to even identify what their responsibilities are or might be. The Bar has jurisdiction to maintain and enforce the Rules of Professional Conduct (the "Rules"). [Bar Rule 4-101] Rule 4-201 limits the Board's authority to "investigate and discipline lawyers for violations of the Georgia Rules of Professional Conduct."

In a review of past disciplinary actions, it appears that the Bar has recognized that its jurisdiction is limited to conduct of a lawyer acting as a lawyer. The complaint form on the Bar's website specifically asks for this information: "If you would like to file a complaint against your lawyer, please download the following grievance form and instructions." (Emphasis added) Rule 8.5(b) provides as follows with respect to any exercise of the disciplinary authority" of the Bar (emphasis added):

In any exercise of the disciplinary authority of this jurisdiction, the rules of professional conduct to be applied shall be as follows:

1. for conduct in connection with a matter pending before a tribunal, the rules of the jurisdiction in which the tribunal sits, unless the rules of the tribunal provide otherwise; and
2. for any other conduct, the rules of the jurisdiction in which the lawyer or Domestic or Foreign Lawyer's conduct occurred, or, if the predominant effect

Paula J. Frederick, Esq.
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of the conduct is in a different jurisdiction, the rules of that jurisdiction shall be applied to the conduct. A lawyer or Domestic or Foreign Lawyer shall not be subject to discipline if the lawyer's or Domestic or Foreign Lawyer's conduct conforms to the rules of a jurisdiction in which the lawyer or Domestic or Foreign Lawyer reasonably believes the predominant effect of the lawyer or Domestic or Foreign Lawyer's conduct will occur.

The Comments to this Rule make it clear that there can be situations where the standards of conduct for lawyers in different jurisdictions may be subject to a conflicts of law analysis. But all such conflicts of law analyses relate to professional conduct in connection with acting as a lawyer.

The Rules of Professional Conduct proscribe certain conduct in dealing with others -- but only "as a lawyer" or "in representation of a client." No complaint cited was filed by a client, former client, opposing counsel in a matter, or a judicial officer. As to the four (4) grievance forms at issue, all four individuals acknowledge that they have had no contact with me -- I have not interacted with any of them at all, much less in a professional capacity.

The Complaint does not specify which of the Rules have been violated in a professional setting. The Complaint attaches over 1600 pages of filings made in four cases (plus a local complaint); Proposed Counsel does not believe those pages are germane at all -- none of them reflect any violation of the Rules in a professional capacity. Further, each of those cases was filed by other attorneys as counsel of record. Three of the four cases were filed in jurisdictions other than Georgia. As noted above, the conduct of the lawyers in those cases are governed by the laws in those jurisdictions. I have not taken any action that would merit even attaching those pages (over 23 megabytes) to the Complaint.

I was only "of counsel" in each of those cases or added for oral argument. I did not seek *pro hac vice* privileges in any of those cases so I was not counsel of record. I am not aware of any disciplinary complaints against any other lawyer leading me to believe, as the facts will show, that the Bar has singled me out for this Complaint based on public statements which, I have previously demonstrated, were based on affidavits provided to me and, in any event, political speech protected by the First Amendment and the state constitutions at issue.

If your actions are taken in connection with an action pending before a tribunal -- including any of the four cases you have attached to the Complaint (all filed by other counsel of record), could you please clarify which case you are referencing, and what specified aspect of the case was a violation of the Rules?

Paula J. Frederick, Esq.
March 2, 2021
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Public and Private Statements

3. The second part of the Complaint cites various public statements and private statements, including tweets/social media posts. I assume that the Bar is not asserting jurisdiction to prevent a lawyer from expressing political opinions, or making statements provided to him in sworn affidavits?

As noted above, I would not make a comment that I did not have a basis for believing was true, particularly if, as a defamation lawyer, I would be opening myself up to a challenge of defamation. I have provided you with copies of the supporting documents that demonstrate the support for those statements, which I assume you at least have reviewed by now. Please confirm that you received the flash drive that I sent with that information and the status of the Board's investigation into the information I provided in response to the 4 complaints filed against me by non-clients.

I have not made any statement to "incite" violence under any applicable precedent. If you believe otherwise, or if you believe I have made comments that are not otherwise protected as free speech, please identify which statements are at issue and how they violate the *Brandenburg* test as enunciated in *Brandenburg v. Ohio*, 395 U.S. 444 (1969). It is not apparent to Proposed Counsel who have read the jumble of comments thrown together in the Complaint. We reserve the right to challenge the authority of the Bar to limit the free speech rights of any lawyer, as set forth in the U.S. and state constitutions and otherwise.

As you know, while the lawyer may have "responsibilities" that are highlighted in the Preamble to the Rules, the lawyer has a "duty" (when necessary) to "challenge the rectitude of official action." How an individual lawyer wants to carry that out is up to that individual. Some have gone to extremes and when they violate the law, they have been punished; a few have subsequently been disciplined. But the issue here is what public and private statements may be subject to "discipline" before a Disciplinary Board as an initial matter. I reserve my rights to speak on political matters as I like and did not give up that right when I became a member of the Bar. No lawyer did.

Protected speech may be inflammatory, and even challenge the legitimacy of the government -- or an election. But to hold that political speech cannot be zealously expressed -- particularly as part of an important national conversation -- would be to muzzle a lawyer in his or her outrage over injustice or unlawful acts or unconstitutional acts by the government. Please expect my Proposed Counsel to challenge the jurisdiction of the Committee over the political speech of lawyers -- no matter how aggressive it may appear to lawyers of the other political party or on the other side of the issue. If you can identify any precedent to the contrary, please identify it.

Paula J. Frederick, Esq.
March 2, 2021
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4. Another portion of your complaint (the WGW civil lawsuit) cites allegations in pending litigation. I have denied those allegations and they are before a court for decision as to their credibility. A mere statement made by a litigant in a complaint cannot be treated as true -- even when contained in a verified complaint. My Proposed Counsel are confused as to how such statements may be relied upon as a basis for a disciplinary complaint, and whether there is any precedent for relying on such statements in a disciplinary proceeding. Any precedent for such treatment would be helpful.

Determination of Impairment

5. Finally, you have asked for a psychological examination, but that seems premature if there is no basis for your statements that I "appear[]" to be impaired to practice law. So far, nothing in the Complaint has dealt in any way with my conduct in the practice of law. Proposed Counsel have asked if there is any specific case which serves as the basis for the Bar to challenge my competency to practice law or which justifies an allegation that I "appeared" impaired. Have you or the Bar identified any case in which a client or former client complained that my competency was impaired, if so, which case? Existing case law only includes arguments for such an examination only after such a hearing had been held and evidence had been presented regarding the attorney's substance abuse or mental incapacity -- in all cases which affected his or her competency as a lawyer.

Rule 4-104 reviews are limited to specific and "appropriate" examinations that are tied to a "determination" by the "State Disciplinary Board". There has been no such determination; or, if there has, I was not invited to participate in any hearing prior to that determination. Proposed Counsel has requested copies of that determination, and the basis on which that determination was made. If it does not exist, we suggest that you postpone or rescind this action until such time as an appropriate hearing as to the basis for such a determination is presented and heard.

I will make a final decision on Proposed Counsel as soon as I can help them (and me) understand the basis for this "complaint."

With professional regards,

Very truly yours,

L. Lin Wood

58. Over the past year and a half, in my personal time at home, I have engaged in political commentary on the social media platforms, Twitter, Parler, and Telegram. In late 2019, I had expressed to several third parties my desire to “semi-retire” to spend time as a writer. Many “fake” accounts have been established on social media sites which misappropriate my name and likeness, and which are not authorized by me. None of my social media posts have been made on a L. Lin Wood, P.C. social media account.

59. Finally, on November 29, 2020, I participated in a Zoom hearing before Judge Timothy C. Batten, Sr. in the case of Peason, et al. v. Kemp, et al., Civil Action No. 1:20-CV-4809-TCB and presented oral argument to Judge Batten in connection with an emergency motion filed by Plaintiffs in that action. After presenting my argument, Judge Batten agreed with my legal position and argument. I believe Judge Batten will attest to my competency and professionalism exhibited at all times during that proceeding. A true and correct copy of the transcript of that hearing is attached hereto as Exhibit A and incorporated herein by reference.


FURTHER AFFIANT SAYETH NOT.



L. Lin Wood, Jr.

Sworn to and subscribed before me

This 29th day of March, 2021



Notary Public

My Commission Expires: 3/4/2025

